



12/17/2013

DARON L. TOOCH (State Bar No. 137269)
KATHERINE M. DRU (State Bar No. 280231)
HOOPER, LUNDY & BOOKMAN, P.C.
1875 Century Park East, Suite 1600
Los Angeles, California 90067-2517
Telephone: (310) 551-8111
Facsimile: (310) 551-8181
E-Mail: dtooch@health-law.com

Attorneys for Plaintiffs BAY AREA SURGICAL
GROUP, INC.; KNOWLES SURGERY
CENTER, LLC, NATIONAL AMBULATORY
SURGERY CENTER, LLC, LOS ALTOS
SURGERY CENTER, LP, FOREST
AMBULATORY SURGICAL
ASSOCIATES, LP, and SOAR SURGERY
CENTER, LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

BAY AREA SURGICAL GROUP, INC.;
KNOWLES SURGERY CENTER, LLC;
NATIONAL AMBULATORY SURGERY
CENTER, LLC; LOS ALTOS SURGERY
CENTER, LP; FOREST AMBULATORY
SURGICAL ASSOCIATES, LP; SOAR
SURGERY CENTER, LLC,

Plaintiffs,

vs.

AETNA LIFE INSURANCE COMPANY, *et*
al.,

Defendants.

CASE NO. 13-CV-05430 EJD

**STIPULATION TO EXTEND TIME TO
RESPOND TO INITIAL COMPLAINT
(L.R. 6-1(a))**

Complaint Filed: November 22, 2013

Trial Date: None set

HOOPER, LUNDY & BOOKMAN, P.C.
1875 CENTURY PARK EAST, SUITE 1600
LOS ANGELES, CALIFORNIA 90067-2517
TEL: (310) 551-8111 • FAX: (310) 551-8181

1 Plaintiffs Bay Area Surgical Group, Inc., Knowles Surgery Center, LLC, National
 2 Ambulatory Surgery Center, LLC, Los Altos Surgery Center, LP, Forest Ambulatory Surgical
 3 Associates, LP, and SOAR Surgery Center, LLC (“Plaintiffs”) and Defendants NDS Surgical
 4 Imaging, LLC and NDS Surgical Imaging, LLC Welfare Benefits Plan (the “NDS Defendants”),
 5 through their undersigned counsel of record, hereby stipulate to extend the date for the NDS
 6 Defendants to answer or otherwise respond to Plaintiffs’ initial complaint (the “Complaint”) in
 7 this matter as follows:

8
 9 WHEREAS, the Complaint was filed on November 22, 2013;

10 WHEREAS, the NDS Defendants were served with the Complaint by personal service on
 11 November 25, 2013;

12 WHEREAS, the NDS Defendants’ deadline to answer or otherwise respond to the
 13 Complaint is December 16, 2013;

14 WHEREAS, the NDS Defendants have requested an extension of time to answer or
 15 otherwise respond to the Complaint;

16 WHEREAS, Plaintiffs have agreed to extend the time for the NDS Defendants to answer
 17 or otherwise respond to the Complaint until January 10, 2014;

18
 19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28

1 NOW THEREFORE, IT HEREBY IS STIPULATED by and between Plaintiffs and the
2 NDS Defendants, through their counsel of record, that the deadline for the NDS Defendants to
3 answer or otherwise respond to the Complaint shall be extended until **January 10, 2014**.

4 IT IS SO STIPULATED.
5

6 DATED: December 16, 2013

HOOPER, LUNDY & BOOKMAN, P.C.

7
8
9 By:

/s/ Katherine M. Dru

KATHERINE M. DRU

10 Attorneys for Plaintiffs BAY AREA SURGICAL GROUP,
11 INC.; KNOWLES SURGERY CENTER, LLC,
12 NATIONAL AMBULATORY SURGERY CENTER,
13 LLC, LOS ALTOS SURGERY CENTER, LP, FOREST
14 AMBULATORY SURGICAL ASSOCIATES, LP and
15 SOAR SURGERY CENTER, LLC

16 DATED: December 16, 2013

LITTLER MENDELSON P.C.

17 By:

/s/ Eric Bellafronto

ERIC BELLAFRONTO

18 Attorneys for Defendants NDS SURGICAL IMAGING
19 LLC and NDS SURGICAL IMAGING, LLC
20 WELFARE BENEFITS PLAN
21
22
23
24
25
26
27
28

HOOPER, LUNDY & BOOKMAN, P.C.
1875 CENTURY PARK EAST, SUITE 1600
LOS ANGELES, CALIFORNIA 90067-2517
TEL: (310) 551-8111 • FAX: (310) 551-8181